

**Marquis Aurbach Coffing**  
JACK CHEN MIN JUAN, ESQ.  
Nevada Bar No. 6367  
NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
BRIAN R. HARDY, ESQ.  
Nevada Bar No. 10068  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SANDRA K. KRAUSE,

Plaintiff,

Case No.:

vs.

Eighth Judicial District Court  
Case No: A-11-653620-C

NEVADA MUTUAL INSURANCE  
COMPANY, a Nevada corporation; TREAN  
CORPORATION, a Minnesota Corporation; and  
ANDREW O'BRIEN, Individually, DOES 1  
through X, and ROE BUSINESS ENTITIES, 1  
through X, inclusive,

Defendant.

**NOTICE OF REMOVAL**

TO: THE UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Defendants, Nevada Mutual Insurance Company ("Nevada Mutual"), TREAN Corporation ("TREAN"), and Andrew O'Brien ("O'Brien"), (collectively "Defendants"), by and through their attorneys of record, hereby give notice of removal of the above-captioned action from the Eighth Judicial District Court of Clark County, Nevada, to the United States District Court for the District of Nevada. Removal of this action is authorized under 28 U.S.C. §§ 1331, 1441, and 1446. The specific grounds for removal are as follows:

1. Plaintiff Sandra Krause ("Plaintiff") commenced this action against Defendants on December 21, 2011, by filing a Complaint for Discrimination, Retaliation, and Employment-Related Torts and Contracts ("Complaint") with the District Court of Clark County, Nevada. A true and correct copy of the Complaint is attached hereto as **Exhibit 1**.

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(702) 382-0711 FAX: (702) 382-5816

1           2.       The state court issued summonses to Defendants on January 17, 2012. True and  
2 correct copies of these summonses are attached hereto as **Exhibits 2, 3, and 4**. Defendants were  
3 personally served with the Summonses and Complaint on February 10, 2012. A true and correct  
4 copy of the Notice of Service is attached hereto as **Exhibit 5**.

5           3.       In the Complaint, Plaintiff alleges claims under Title VII of the Civil Rights Act  
6 of 1964, as amended by the 1991 Civil Rights Act, 42 U.S.C. § 2000e. Plaintiff also alleges  
7 claims under Nevada statutory and common law.

8           4.       This action is subject to removal pursuant to 28 U.S.C. § 1441, in that it is one in  
9 which the district courts of the United States have original jurisdiction pursuant to 28 U.S.C. §  
10 1331, because Plaintiff's Title VII claims arise under the laws of the United States.

11          5.       This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant  
12 to 28 U.S.C. § 1367(a).

13          6.       In accordance with 28 U.S.C. § 1446(b), this notice is filed with the court within  
14 thirty (30) days after Defendants received the Summonses and Complaint.

15          7.       In accordance with 28 U.S.C. § 1446(d), written notice of the filing of this notice  
16 will be given to Plaintiff and a copy of this notice shall be filed with the clerk of the District  
17 Court of Clark County, Nevada.

18               WHEREFORE, Defendants respectfully request that the above-captioned action be  
19 removed from the District Court of Clark County, Nevada, to this Court.

20           Dated this 1 day of March, 2012.

21  
22                               MARQUIS AURBACH COFFING

23                                 
24                               By \_\_\_\_\_

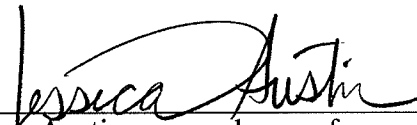
25                               Jack Chen Min Juan, Esq.  
26                               Nevada Bar No. 6367  
27                               Nick D. Crosby, Esq.  
28                               Nevada Bar No. 8996  
                              Brian R. Hardy, Esq.  
                              Nevada Bar No. 10068  
                              10001 Park Run Drive  
                              Las Vegas, Nevada 89145  
                              Attorney(s) for Defendants

**CERTIFICATE OF MAILING**

I hereby certify that on the 1<sup>st</sup> day of March, 2012, I served a copy of the foregoing **NOTICE OF REMOVAL** upon each of the parties by depositing a copy of the same in a sealed envelope in the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and addressed to:

Kathleen J. England, Esq.  
ENGLAND LAW OFFICE  
630 South Third Street  
Las Vegas, Nevada 89101  
Attorney for Plaintiff

and that there is a regular communication by mail between the place of mailing and the place(s) so addressed.

  
\_\_\_\_\_  
Jessica Austin, an employee of  
Marquis Aurbach Coffing

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